

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I - EPA New England

Drafted Date: July 20, 2012
Finalized Date: August 22, 2012

SUBJECT: Partial Compliance Evaluation of New Haven Terminals, East Haven Terminal,
East Haven, CT

FROM: Elizabeth Kudarauskas, Environmental Engineer, Air Technical Unit

*EAL
8/22/12*

THRU: Christine Sansevero, Senior Enforcement Coordinator, Air Technical Unit

*CMS
8/23/12*

TO: File

I. Facility Information

- A. Facility Name: New Haven Terminal Inc.
- B. Facility Location: 119 Frontage Street, East Haven, CT 06512
- C. Facility Mailing Address: same
- D. Facility Contact: Robert Karecki, Manager
- E. Type of Source (major/minor/sm/sm80): TV Major
- F. Date Title V permit issued: January 19, 2011
- G. AFS #: 0900901105

II Background Information

- A. Date of inspection: July 12, 2012
- B. Weather Conditions: sunny, hot, temps in the 90's
- C. US EPA Representative(s):
 - Beth Kudarauskas, Air Tech Unit, OES
 - Bill Osbahr, OEME
 - Mike Looney, OEME
- D. State Representative(s): Charmaine Molyneaux
- E. Federally Enforceable Requirements Covered During the Inspection:
 - TV Permit
 - 40 CFR Part 60 Subpart XX
 - 40 CFR Part 63 Subpart R, if applicable
 - 40 CFR Part 60 Subpart K, if applicable
 - 40 CFR Part 63 Subpart Y, if applicable
 - 40 CFR Part 63 Subpart BBBBBB, if applicable

III Purpose of Inspection

The purpose of this inspection was to evaluate applicability and compliance of the New Haven Terminal with respect to the Subpart R and Subpart BBBBBBBB MACT regulations. In addition, EPA conducted monitoring to determine whether excess VOC emissions were being emitted from the facility.

IV Facility Description

A. Company / Facility History

In Connecticut, New Haven Terminal operates two terminals. The terminal at 100 Waterfront Street is located in New Haven, CT and a terminal in East Haven, CT is located at 119 Frontage Road.

The facility is considered a "for hire terminal" meaning that New Haven Terminal is responsible for storing, handling and distributing the products. However, New Haven Terminal does not own the product.

The New Haven Terminal facility in East Haven does not store or distribute gasoline at this time. However, the facility maintains Title V permits to allow for gasoline operations in the future.

B. Corporate Structure and CEO/President/owner name and mailing address

New Haven Terminals is a privately held company. Mr. Joseph Crowely is the owner and Mr. Robert Karecki is the Manager. The main office for New Haven Terminal is located at 100 Waterfront Street in New Haven, CT.

C. Number of Employees and Working Hours

The facility loading operations are conducted 24 hours a day, 7 days a week. New Haven Terminal currently employs approximately 15 people in the New Haven area.

V Inspection

A. Entry

The EPA and CT DEEP inspectors arrived unannounced at the New Haven Terminal facility located on Waterfront Street at 9:00 am. The EPA inspectors (Ms. Kudarauskas, Mr. Osbahr, and Mr. Looney) showed their credentials to Mr. Peter Makosky, the Administrative Assistant. Ms. Molyneaux identified herself as an inspector from CT DEEP.

B. Opening Conference

The inspectors sat down with Mr. Makosky of New Haven Terminals for the opening conference. Mr. Karecki briefly stopped into the conference room to introduce himself. He was unable to stay due to a doctor appointment. During the opening conference, Ms. Kudarauskas explained

that the purpose of the inspection was to evaluate compliance with air regulations. The inspectors explained that they were planning to evaluate compliance with gasoline regulations and to gather information about the storage and distribution of #6 oil and asphalt by New Haven Terminals.

The inspectors explained that in addition to the routine inspection they would be using some monitoring equipment to evaluate facility operations. Mr. Looney explained that he brought a forward looking infra-red (FLIR) camera with him to visually detect gasoline vapor leaks.

Mr. Makosky explained that New Haven Terminal has two facilities in the New Haven area. He further explained that although each facility still maintained a Title V permit, no gasoline was at either facility. According to Mr. Makosky, New Haven Terminals has not had gasoline on-site at either facility since the late 1990's. The gasoline loading racks were disconnected and the gasoline tanks had been converted to store distillates.

Furthermore, Mr. Makosky explained that New Haven Terminal no longer stores bulk chemicals. There are no vapor collection and control systems at either facility. New Haven Terminal does not have any #6 oil or asphalt storage at either facility in the New Haven area.

Mr. Makosky explained that New Haven Terminal facilities were managed out of the Waterfront Street office. Mr. Makosky provided the inspectors with a site map for the New Haven facilities in Connecticut. Mr. Makosky also provided the inspectors with a printout of all the New Haven Terminal tanks with tank capacity, current tank fill level and product. The table below summarizes the tank information.

New Haven Terminal		
Tank ID	Product	Terminal
101	2 oil	EH
102	2 oil	EH
103	2 oil	EH
104	2 oil	EH
105	2 oil	EH
107	2 oil	EH
108	2 oil	EH
109	2 oil	EH
110	2 oil	EH
111	2 oil	EH
112	2 oil	EH
113	2 oil	EH
114	2 oil	EH
115	2 oil	EH

1	2 oil	NH
2	2 oil	NH
3	2 oil	NH
4	2 oil	NH
6	2 oil	NH
7		NH
8		NH
13	2 oil	NH
14		NH
15	2 oil	NH
16		NH
17		NH
18	ULSD	NH
19	ULSD	NH
20	2 oil	NH
21	2 oil	NH
21	ULSD	NH
22	Bio	NH
22	ULSD	NH
23	2 oil	NH
24	2 oil	NH
25	2 oil	NH
27	Bio	NH
27	ULSD	NH
28	Bio	NH
28	ULSD	NH
29	Bio	NH
29	ULSD	NH
106	2 oil	NH

EH - 119 Frontage Road, East Haven Terminal

NH - 100 Waterfront Street, New Haven

Terminal

- The New Haven Terminal's East Haven location had a truck loading rack that is now decommissioned and not in use.

Product is primarily brought to the East Haven Terminal by pipeline from the Waterfront Street Terminal. Product is received at Waterfront Street on ships and barges that use the facility dock

on New Haven Harbor. The Waterfront Street terminal has the ability to load distillate onto barges, if necessary. The East Haven Terminal does not have a dock or a loading rack. All product is transferred into and out of the East Haven Terminal by the inter-terminal pipeline or the Buckeye Pipeline.

New Haven Terminals does not operate a fleet of tanker trucks and there is no vehicle fueling at any of their Connecticut locations. There is no vehicle maintenance conducted on site and there are no degreasers at either facility.

C. Plant Walkthrough

The inspectors conducted a walkthrough of New Haven Terminal's East Haven location on July 12, 2012. Ms. Kudarauskas observed the obviously decommissioned loading rack. The loading rack was rusted and no truck connectors were present.

In the tank farm at the East Haven Terminal, the inspectors observed a vacuum truck cleaning out Tank 101. Mr. Looney and Mr. Osbahr climbed on top of Tank 104 with the FLIR camera to conduct a survey of the tank farm. No significant emission plumes were detected at the time of the inspection.

The inspectors then drove the perimeter of the tank farm.

E. Closing Conference

The inspectors conducted a brief closing conference at the end of the day. Before the closing conference the inspectors visited both of the New Haven Terminals: Waterfront Street in New Haven and Frontage Road in East Haven.

The inspectors thanked Mr. Makosky for his time and left the facility at approximately 11:00 am.

